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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
MEDFORD DIVISION

HOME CARE DELIVERY SERVICES,
LLC, a.b.n. ALL CARE IN-HOME CARE
SOLUTIONS and ALL CARE HOME
CARE SUPPORT SERVICES,

Plaintiff,

vs.

ALL YOUR CARES IN HOME SUPPORT
SERVICES, LLC,

Defendant.

Case No.:

COMPLAINT

**(Federal Unfair Competition, Common
Law Trademark Infringement and
Unfair Competition, Dilution of
Trademark, Willful Dilution of
Trademark)**

Relief Sought: Injunctive Relief,
Damages, Attorney Fees

DEMAND FOR JURY TRIAL

COMPLAINT

1. This is a trademark infringement and unfair competition case arising from All Your Cares In Home Support Services, LLC's ("Defendant") deliberate use of Plaintiff's trademark, "All Care." Plaintiff seeks: (i) an injunction enjoining Defendant from further use in the Oregon market of any trademark consisting of or including the term "All

Care,” or any other trademark confusingly similar thereto, in connection with the marketing, promotion, sale and provision of healthcare related services; (ii) an award of damages as a result of Defendant’s infringement and unfair competition to date.

THE PARTIES

2. Plaintiff, Homecare Delivery Services, LLC, assumed business names “All Care In-Home Care Solutions” and “All Care Home Care Support Services” (“Plaintiff”), is an Oregon Limited Liability Company, registered with the Oregon Secretary of State since March 16, 2016, with its principal place of business at 255 W. Stewart Avenue, Suite 101, Medford in Jackson County, Oregon. Plaintiff’s assumed business name “All Care Home Care Support Services” has been registered with the Oregon Secretary of State to Plaintiff since May 5, 2016. Plaintiff’s assumed business name “All Care In-Home Care Solutions” has been registered with the Oregon Secretary of State to Plaintiff since December 8, 2016. The trade name “All Care” has been used continuously in commerce since 1994, by Plaintiff’s predecessor in interest of the tradename—All Care in Home Support Services, Inc.—and since 2016 by Plaintiff.

3. Defendant is registered with the State of Oregon as, and operates under the tradename “All Your Cares In Home Support Services, LLC” (an amalgamation of Plaintiff’s two assumed business names: “All Care In-Home Care Solutions,” and “All Care Home Care Support Services,” which is also suspiciously similar to Plaintiff’s predecessor’s name “All Care in Home Support Services, Inc.”), hereinafter referred to as “Defendant.” Defendant is an Oregon limited liability company, registered with the Oregon Secretary of State by its

managing member, Ms. Kell-Scobie on November 2, 2017, with its principal place of business in Jackson County, Oregon. When Defendant opened its primary business office on or about January 28, 2019, Plaintiff's Medford Office was already located at 2574 W. Main Street, in Medford, Oregon. Defendant nonetheless opened its office on the same street. Defendant's business is located at 843 E. Main Street, Suite 101B in Medford, Oregon. Defendant advertises itself as providing home care and support services in Jackson County, an area that overlaps with Plaintiff's Medford service area.

JURISDICTION AND VENUE

4. This Court has subject matter jurisdiction over the claims alleged herein pursuant to Section 39 and of the Lanham Act, 15 U.S.C. § 1121, and under 28 U.S.C. §§ 1331 and 1338, because this action arises, in part, under 15 U.S.C. § 1125. This Court has subject matter jurisdiction over Plaintiff's related state and common law claims pursuant to 28 U.S.C. § 1338, because these claims are substantial and related claims under federal trademark law, and pursuant to the doctrine of supplemental jurisdiction, 28 U.S.C. § 1337.
5. Venue is proper in this judicial district under 28 U.S.C. 1391(b)(2) because a substantial part of the events or omissions giving rise to Plaintiff's claims occurred in this judicial district. Venue is also proper in this judicial district under 28 U.S.C. § 1391(b)(1), (c) and (d).
6. This Court has personal jurisdiction over Defendant because, on information and belief, it is a limited liability company duly organized and validly existing under the laws of the State of Oregon and its principal place of business is located within Oregon. On

information and belief, from its offices located in Medford, Oregon, Defendant markets, promotes, sells and otherwise provides in-home care services to clients throughout Oregon.

FACTS COMMON TO ALL CLAIMS

7. Plaintiff is a qualified in-home care services provider serving clients throughout Oregon. Plaintiff is in the business of, among other things, the marketing, promotion, sale and provision of in-home care services to clients throughout the State of Oregon. Among other things, Plaintiff provides temporary and long-term personal care for those unable to care for themselves, including personal care, medication supervision, light housekeeping, shopping, household management, transportation, and related healthcare services to its clients (collectively the “All Care Services”).

8. Plaintiff provides the All Care Services through its offices located in Jackson, Josephine, and Klamath Counties to their corresponding service areas. Plaintiff also markets and promotes the All Care Services to potential clients throughout Oregon over the Internet through its website, <https://allcareonline.com/> and its Facebook page, and further generates a significant portion of its business through word-of-mouth and referrals from its current and former clients, their families, doctors, home health agencies, hospice agencies, local and state social service agencies, and other healthcare professionals with whom it has worked with in the past or to whom Plaintiff has directly marketed the All Care Services.

9. Since at least as early as 1994 and continuing through the present date, Plaintiff or its predecessor in interest, has provided the All Care Services under the trade name “All Care” (the “All Care Mark”). Plaintiff has spent substantial sums promoting its business and the

All Care Services offered under its All Care Mark such that a significant portion of Plaintiff's relevant consumer demographic in the Oregon market has come to associate the All Care Mark with Plaintiff.

10. As a result of Plaintiff's continuous and substantially exclusive use of its All Care Mark in the Oregon in-home care market, and its sales, advertising and promotional efforts under the All Care Mark, the All Care Mark has become closely associated with Plaintiff and has come to be recognized favorably by Plaintiff's relevant consumer demographic within the State of Oregon market as an indicator of source for the All Care Services. Accordingly, Plaintiff owns valuable goodwill in connection with its All Care Mark.

11. Since March, 2016, Plaintiff, and Plaintiff's predecessor before it, have used the All Care Mark pursuant to a license to use and enforce the mark granted by the current owner of the Mark, All Care Health Plan, Inc. formerly Mid Rogue Independent Physician Association, Inc. ("Mid Rogue"). The All Care Mark was originally registered to Plaintiff's predecessor, All Care in Home Support Services, Inc., and was the subject of a former Oregon State trademark registration Oregon Reg. No. 42597, on or about September 26, 2013, for use in connection with "providing in-home health care services, advising patients as to insurance coverage, medication, nutrition, lifestyle and providing hospice care." That registration's first use date was December 1994. In November 2013, then-owner of the Mark, All Care in Home Support Service, Inc., filed suit in Federal Court against Mid Rogue Independent Physician Association, Inc. (now Allcare Health Plan, Inc.) for trademark infringement and related claims, for the defendant's use of the name "Allcare Health Plan."

See Oregon Dist. Court Case No. 1:13-CV-2004. As part of the settlement for that case, Plaintiff's predecessor sold the All Care Mark to Mid Rogue. Mid Rogue licensed back to Plaintiff's predecessor a perpetual and exclusive license to use and enforce the Mark with respect to in-home care services. In March of 2016, Plaintiff purchased the assets of All Care in Home Support Service, Inc., including the license to use the All Care Mark. The All Care Mark has been used continuously in commerce since 1994 by Plaintiff or its predecessor.

12. The All Care Mark is the subject of a USPTO registration, "AllCare" U.S. Serial No. 86441919, with a registration date of November 24, 2015. The owner of the All Care Mark is All Care Health Plan, Inc., formerly Mid Rogue Independent Physician Association, Inc.

13. On information and belief, Defendant is an Oregon limited liability company, registered with the Oregon Secretary of State by its managing member, Ms. Kell-Scobie on November 2, 2017, with its principal place of business in Jackson County, Oregon. Upon information and belief, Defendant is in the business of, among other things, the marketing, promotion, sale and provision of in-home care services, including personal care, and household management, to clients throughout the State of Oregon.

14. On information and belief, on or around November 2, 2017, Defendant began marketing, promoting, and selling its in-home care services, targeting the same markets as Plaintiff, including the elderly and disabled, in Southern Oregon using the name "All Your Cares In Home Support Services," the "Infringing Mark."

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15. In or around May and June of 2019, Plaintiff received information that third parties were confused by the Infringing Mark such that they mistook Defendant for Plaintiff, and Defendant's services for Plaintiff's All Care Services. For example, a caregiver saw an open position with Defendant online and came to Plaintiff's office, believing that the ad was for an open position with Plaintiff and intending to apply with Plaintiff. One prospective client's family member went to Defendant's office after DHS had referred the prospective client to Plaintiff. Another prospective client was referred to Plaintiff by a friend who had used Plaintiff's services. That prospective client mistakenly enrolled in services with Defendant before realizing that Defendant was not the company their friend had used. These examples constitute evidence of actual consumer confusion among consumers as to the origin, source, sponsorship or affiliation of the parties and/or their respective in-home care services.

16. On or about, September 5, 2019, counsel for Plaintiff notified Defendant's managing member Ms. Kell-Scobie via letter of Plaintiff's rights in the All Care Mark and of Defendants' infringement of the All Care Mark. Defendant, through counsel, refused to cease using the Infringing Mark and has persisted in its use of the Infringing Mark within the in-home care market in Oregon.

17. Plaintiff has senior rights in its All Care Mark based on first use in commerce in Oregon. Tracing the Mark's use to commerce by Plaintiff's predecessor in 1994, Plaintiff's use of its mark predates Defendant's use of the Infringing Mark by more than 20 years.

18. The All Care Mark and the Infringing Mark are identical and/or near identical in sound, sight, and commercial impression in that dominant portions of both marks are the

words “All” and “Care.” Furthermore, there is little visual or phonetic dissimilarity between the dominant portion of the All Care Mark and the Infringing Mark. Consumers encountering the parties’ respective marks in the marketplace are likely to deem the All Care Mark and the Infringing Mark as having an identical commercial impression.

19. Plaintiff and Defendant provide the same services including in-home care services for clients having long term and temporary medical needs or disabilities.

20. Defendant’s service area directly overlaps Plaintiff’s Medford, Oregon service area.

21. Plaintiff and Defendant market, promote and/or sell their respective services to the same classes of consumers and in overlapping marketing and trade channels. For example, both Plaintiff and Defendant advertise, market, and promote their respective services directly to prospective clients in Southern Oregon and elsewhere through their respective websites,

<https://allcareonline.com/> (Plaintiff’s website) and <https://all-your-cares-in-home-support.business.site/> (Defendant’s website). Additionally, Defendant uses the same or substantially similar color scheme as Plaintiff. *See Exhibit 1.* Both Plaintiff and Defendant advertise, market, and promote their respective services directly to prospective clients in

Southern Oregon and elsewhere through their respective Facebook pages,

<https://www.facebook.com/allcareonline/> (Plaintiff’s Facebook page);

<https://www.facebook.com/allyourcaresihss/> (Defendant’s Facebook page). *See Exhibit 2.*

Further, on information and belief, Defendant markets, promotes and sells its in-home care services directly to potential clients, their families, and to hospitals, doctors and other healthcare professionals who may refer potential clients. Similarly, Plaintiff markets and

promotes the All Care Services directly to potential clients, their families, and to hospitals, doctors and other health care professionals who may work with potential clients in selecting in-home care providers like Plaintiff. Thus, Defendant markets, promotes and sells its healthcare related services through the same trade channels and to the same classes of consumers as Plaintiff.

22. Defendant's logo is also similar to Plaintiff's logo in several ways. Each logo has two lines of text. The first line of each is a large, cursive font in shades of magenta. The first lines of each say "All Care," and "All Your Cares,"—Plaintiff's and Defendant's logos respectively. The second line of text in each logo is smaller and in a sans serif font. The second lines say "In-Home Care Solutions," and "In Home Support Services," for Plaintiff's and Defendant's logos respectively. Copies of Plaintiff's and Defendant's logos are included herein as Exhibit 3.

23. Defendant is not an authorized licensee of Plaintiff, and Plaintiff has never authorized or otherwise given Defendant permission to use any form of Plaintiff's All Care Mark.

FIRST CLAIM FOR RELIEF

(Federal Unfair Competition, 15 U.S.C. § 1125(a)(1)(A))

24. Plaintiff incorporates by reference all paragraphs set forth above.

25. Defendant's use of the Infringing Mark in commerce in connection with the marketing, promotion, sale and provision of its in-home care services in Oregon is likely to cause confusion, mistake and deception as to the affiliation, connection or association of Defendant with Plaintiff, or vice versa, or as to the origin, sponsorship or approval of Defendant's in-home care services

by Plaintiff, or vice versa. Defendant's actions therefore constitute infringement of Plaintiff's All Care Mark in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a).

26. Defendant has made false representations, false descriptions, and false designations of origin of its services in violation of 15 U.S.C. § 1125(a) by using the Infringing Mark in connection with Defendant's in-home care services in Oregon.

27. Defendant's activities have caused and, unless enjoined by this Court will continue to cause, a likelihood of confusion and deception among members of the healthcare industry within the State of Oregon, among Plaintiff's relevant consumer demographic within Oregon, and the public at large.

28. The likelihood of confusion, mistake and deception caused by Defendant's use of the Infringing Mark in connection with in-home care services has caused and is currently causing irreparable harm to the goodwill and reputation symbolized by Plaintiff's All Care Mark.

29. Plaintiff lacks an adequate remedy at law because the All Care Mark is unique and represents to the public the source, reputation, and goodwill of the All Care Services. Certain damages caused by Defendant's acts may not be susceptible to any ready or precise calculation of damages because such damages involve lost business opportunities and loss of goodwill. Accordingly, monetary damages alone cannot fully compensate Plaintiff for Defendant's misconduct.

30. Plaintiff is entitled to an injunction under 15 U.S.C. § 1116 against Defendant's continued use of the Infringing Mark, or any confusingly similar variations of Plaintiff's All Care Mark, in the State of Oregon. Unless enjoined, Defendant will continue to use the Infringing Mark and continue to cause consumer confusion and injure Plaintiff's goodwill and reputation.

31. As a direct and proximate result of Defendant's conduct, Plaintiff is also entitled to recover three (3) times its actual damages and the profits wrongfully obtained by Defendant attributable to the infringement in an amount to be proven at trial.

30. Defendant's actions in adopting and using the Infringing Mark in connection with in-home care services which are identical or closely related to the All Care Services offered by Plaintiff under its All Care Mark give rise to an inference of intentional, willful and malicious intent on the part of Defendant to trade on the goodwill associated with Plaintiff's All Care Mark and to cause confusion, to cause mistake and to deceive the public about the source or affiliation of Defendant's services and/or vice versa. Accordingly, this is an exceptional case under 15 U.S.C. § 1117(a) justifying an award of Plaintiff's reasonable attorneys' fees.

SECOND CLAIM FOR RELIEF

(Common Law Trademark Infringement and Unfair Competition)

32. Plaintiff incorporates by reference all paragraphs set forth above.

33. Defendant is using the Infringing Mark in a manner that has already or is likely to cause confusion, to cause mistake, and to deceive members of the healthcare service industry within the State of Oregon, Plaintiff's relevant consumer demographic within Oregon, and the public at large, as to the affiliation, connection, or association of Defendant with Plaintiff, or vice versa, or as to the origin, sponsorship, and approval of Defendant's healthcare related services by Plaintiff, or vice versa.

34. Defendant's acts constitute common law trademark infringement and unfair competition and have created and will continue to create a likelihood of confusion in the Southern Oregon market, thereby causing irreparable harm to Plaintiff, including without limitation, injury to its

reputation and business identity, resulting in lost revenue and profits and diminished goodwill and reputation. Plaintiff has no adequate remedy at law for this injury.

35. On information and belief, Defendant acted with full knowledge of Plaintiff's use of and rights in the All Care Mark and without regard to the likelihood of confusion of the public created by Defendant's activities.

36. Defendant's actions demonstrate an intentional, willful and malicious intent to trade on the goodwill associated with Plaintiff's All Care Mark to the great and irreparable injury of Plaintiff.

37. As a result of Defendant's acts, Plaintiff has been damaged in an amount not yet determined or ascertainable. At a minimum, Plaintiff is entitled to injunctive relief, to an accounting of Defendant's profits, actual damages, punitive damages, and costs.

THIRD CLAIM FOR RELIEF

(Dilution of Service Mark or Trade Name – O.R.S. § 647.107)

38. Plaintiff realleges all previous paragraphs.

39. Plaintiff's trade names and/or service marks in the term "All Care" and the names "All Care Home Care Support Services" and "All Care In-Home Care Solutions," are widely recognized as a designation of the source of Plaintiff's in-home care services. Plaintiff's marks are used in advertising across the state and Plaintiff serves over 300 clients in its Medford service area alone on an annual basis. Plaintiff's marks are famous and distinctive in this state and was famous and distinctive at the time Ms. Amanda Kell-Scobie registered the "All Your Cares" business name.

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40. Defendant began using the “All Your Cares” mark in commerce to describe the same services Plaintiff provides after Plaintiff’s marks became famous. Defendant’s business name has already caused or is likely to cause confusion among Plaintiff’s customers and users of Plaintiff’s services as to the source of those services.

41. Defendant’s use of the words “All” and “Care” together or in conjunction with the phrases “In-Home Care Solutions,” “Home Care Support Services” or any combination thereof, should be enjoined within the geographic area of the State of Oregon pursuant to O.R.S. § 647.107(1).

41. On information and belief, Defendant acted with full knowledge of Plaintiff’s use of and rights in the All Care Mark and without regard to the likelihood of confusion of the public created by Defendant’s activities. Defendant’s actions demonstrate an intentional, willful and malicious intent to trade on the goodwill associated with Plaintiff’s All Care Mark to the great and irreparable injury of Plaintiff. Pursuant to O.R.S. § 647.107(4), Defendants’ willful intent to dilute and dilution of Plaintiff’s marks entitles Plaintiffs to all remedies and damages available under ORS Chapter 647 including:

- a. All damages Plaintiff suffered as a result of Defendants’ use of the infringing mark;
- b. All profits Defendants derived from their use of the infringing mark;
- c. A sum up to three times the amounts listed above, pursuant to ORS 647.105(2).
- d. Pre- and post-judgment interest at the legal rate of 9%.

FOURTH CLAIM FOR RELIEF

(Unlawful Trade Practices Act Violation – Attorney Fees O.R.S. § 646.608)

42. Plaintiff realleges all previous paragraphs.

43. Defendants passed off the services of Defendant All Your Cares as though they were Plaintiff's services and/or caused likelihood of confusion or misunderstanding as to the affiliation, connection, or association with Plaintiff's business or as to the source, sponsorship, approval or certification of the services Defendant All Your Cares provides.

44. As a result of Defendants' unlawful business practices, Plaintiff is entitled to its actual damages or statutory damages of \$200, whichever is greater, plus pre- and post-judgment interest at the legal rate of 9%. Plaintiff is further entitled to its reasonable attorney fees, costs and disbursements, pursuant to O.R.S. § 646.638.

FIFTH CLAIM FOR RELIEF

(Intentional Interference with Economic Relations)

45. Plaintiff realleges all previous paragraphs.

46. On information and belief, Defendant acted with full knowledge of Plaintiff's use of and rights in the All Care Mark and without regard to the likelihood of confusion of Plaintiff's clients and prospective clients created by Defendant's activities. Defendant's actions demonstrate an intentional, willful and malicious intent to trade on the goodwill associated with Plaintiff's All Care Mark to the great and irreparable injury of Plaintiff.

47. Due to Defendant's intentional interference with Plaintiff's economic relations, Plaintiff is entitled to damages in an amount to be proved at trial plus pre- and post-judgment interest at the legal rate of 9%.

JURY DEMAND

48. Pursuant to F.R.C.P. 38(b), Plaintiff hereby demands a trial by jury of all issues so triable that are raised herein or which hereinafter may be raised in this action.

WHEREFORE, Plaintiffs pray for the following relief:

1. Compensatory damages;
2. Statutory damages;
3. A preliminary and permanent injunction, enjoining and restraining Defendant

from further use in the Oregon market of any trademark consisting of or including the term
“All Care,” or any other trademark confusingly similar thereto, in connection with the
marketing, promotion, sale and provision of in-home care related services;

4. Plaintiffs’ attorney fees, expert fees, and costs; and
5. Such other relief as the Court deems just and equitable.

DATED: October 16, 2019.

HORNECKER COWLING LLP

/s/ Charles E. Bolen
CHARLES E. BOLEN, OSB No. 962249
Of Attorneys for Plaintiff

Exhibit 1-1 (Plaintiff's Website)

The screenshot shows a web browser window displaying the homepage of All Care In-Home Care Solutions. The page features a large central image of a young woman smiling and holding a pink flower, while an older woman looks at her. Two circular buttons on the left side of the image say "Looking for Care" and "Become a Caregiver". The website header includes the logo "All Care In-Home Care Solutions", a phone number "Call Today: (541) 857-9195", and a navigation menu with links to Home Care Services, About Us, Home Care Tips, Caregiver Careers, Blog, and Contact Us. The footer contains a testimonial, a statement about being the largest locally owned home care agency in Southern Oregon, and a "Accenting" logo.

Home Health Care Medford, Ore. [+/-](#)

allcareonline.com

All Care
In-Home Care Solutions

Call Today: (541) 857-9195

Home Care Services About Us Home Care Tips Caregiver Careers Blog Contact Us

Looking for Care

Become a Caregiver

Responsive, high-quality home care for our clients.

As the largest locally owned home care agency in Southern Oregon, All Care is dedicated to providing exceptional customer service, clear communication, and a positive experience for everyone involved.

Accenting

<https://allcareonline.com>

Exhibit 1-2 (Defendant's Website)

Screenshot of a web browser showing the homepage of All Your Cares In Home Support Services, LLC.

The browser address bar shows the URL: <https://all-your-cares-in-home-support.business.site/>. The page title is "All Your Cares In Home Sup...". The top right corner includes standard browser controls (minimize, maximize, close) and a toolbar with icons for home, star, refresh, etc.

The main content area features the company name in large, bold, teal text:

All Your Cares In Home Support Services, LLC

Below the name, the text "Home Health Care Service in Medford" and "Open 24 hours" is displayed. A teal "GET QUOTE" button is centered below this information.

A large, stylized logo is prominently displayed in the center of the page. It features two interlocking hearts, one yellow and one purple, with a small human figure standing between them. Below the logo, the company name "All Your Cares" is written in a large, flowing purple script font, followed by "IN HOME SUPPORT SERVICES" in a smaller, sans-serif font.

The bottom right corner of the screenshot shows a zoom control indicating "100%".

Exhibit 2-1 (Plaintiff's Facebook)

We won't support this browser soon. For a better experience, we recommend using another browser. [Learn More](#)

All Care In-Home Care Solutions

Home | **Create** | **Profile** | **Messenger** | **Notifications** | **Help**

All Care In-Home Care Solutions [@allcareonline](#)

Home

[Reviews](#) [Photos](#) [Posts](#) [Events](#) [About](#) [Community](#) [Jobs](#)

[Create a Page](#)

(541) 857-9195
High-quality, all-access, southern Oregon home care.

[Like](#) [Follow](#) [Share](#) [...](#) [Call Now](#) [Send Message](#)

Write a post...

[Photo/Video](#) [Tag Friends](#) [Check in](#) [...](#)

Photos

About

255 W, Stewart Ave., Ste. 101 (1.37 mi)
Medford, Oregon 97501
[Get Directions](#)

(541) 857-9195

[Send Message](#)

[allcareonline.com](#)

[Home Health Care Service - Medical Center](#)

[Price Range \\$\\$](#)

[Suggest Edits](#)

Come help us celebrate the NEW Grants Pass office by joining us at our Open House!!!

Wednesday, August 29th | 5 to 7 PM

Goody Bags, Food and Drink.
Drawing for a Gift Basket!
on Ave Unit E, Grants Pass, Oregon

541.507.1234

All Care In-Home Care Solutions [Responsive, all access home care for families in Southern Oregon](#)

[See All](#)

Posts

All Care In-Home Care Solutions posted a job.
2 hrs ·

LOOKING FOR AN OPPORTUNITY TO LEARN AND GROW?
A CAREER IN CAREGIVING MAY BE YOUR ANSWER!

All Care is the largest locally, and independently owned home care agency in Southern Oregon. All Care has been family owned and operated for twenty-five years and has a reputation for delivering exceptional service to clients. Join our team of hardworking individuals who are dedicated to providing great service to clients and their families. This is an opportunity to join a fast-growing ... [See More](#)

Related Pages

Harmony Home Health... [Medical Service](#) [Like](#)

Live Well at Home by... [Senior Center](#) [Like](#)

Responsive Home Care [Home Health Care Service](#) [Like](#)

All Your Cares In Home Supp...

Exhibit 2-2 (Defendant's Facebook)

We won't support this browser soon. For a better experience, we recommend using another browser. [Learn More](#)

f All Your Cares In Home Support Services, LLC Search



All Your Cares In
Home Support
Services, LLC
[@allyourcaresihss](#)

- [Home](#)
- [Reviews](#)
- [Photos](#)
- [Videos](#)
- [Posts](#)
- [Events](#)
- [About](#)
- [Community](#)
- [Jobs](#)

[Create a Page](#)



[Like](#)
[Follow](#)
[Share](#)
...
[Book Now](#)
[Send Message](#)

Appointment Availability

Wed, Oct 16

9:45 AM	10:15 AM	10:45 AM	11:15 AM
11:45 AM	12:15 PM	12:45 PM	1:15 PM
1:45 PM	2:15 PM	2:45 PM	3:15 PM

[See All](#)

Write a post...

[Photo/Video](#) [Tag Friends](#) [Check in](#) [...](#)

Photos





[See All](#)

Videos

No Rating Yet

[Ask](#)

[Ask](#)

[Ask](#)

Type a question...

Community

[Invite your friends to like this Page](#)

300 people like this

302 people follow this

About

843 E Main St Suite 204 (0.26 mi)
Medford, Oregon 97504
[Get Directions](#)

(541) 951-4302

Typically replies within a day
[Send Message](#)

[Home Health Care Service](#)

[Price Range \\$](#)

[Hours](#)
Always Open

[Suggest Edits](#)

Page Transparency [See More](#)

Facebook is showing information to help you better understand the purpose of a Page. See actions taken by the people who manage and post content.

[Page created - November 20, 2017](#)

Team Members



Amanda Kell-Scobie

<https://www.facebook.com/allyourcaresihss/>

10/16/2019

Exhibit 2-3 (Defendant's Facebook - Post)

We won't support this browser soon. For a better experience, we recommend using another browser. [Learn More](#)

f All Your Cares In Home Support Services, LLC Home Create

All Your Cares In Home Support Services, LLC
@allyourcaresihss

- [Home](#)
- [Reviews](#)
- [Photos](#)
- [Videos](#)
- Posts**
- [Events](#)
- [About](#)
- [Community](#)
- [Jobs](#)

[Create a Page](#)

Like
 Follow
 Share
...

[Book Now](#)
 Send Message

All Your Cares In Home Support Services, LLC posted a job. •••

October 13 at 8:34 PM ·

The caregiver provides hands-on personal care to clients who are unable to care for themselves. This includes providing assistance with clients' activities of daily living, including: personal care, maintaining mobility, nutrition/hydration, elimination/toileting, using assistive devices, managing the clients' environment and providing client safety, collecting data, observing, listening, recording and reporting. The caregiver also provides assistance with clients' instrumental activities of daily living such as light housekeeping, laundry, cooking meals, grocery shopping, transportation to appointments, and shopping. The caregiver may also be required to provide medication reminding and/or administration.

In Home Caregiver

ALL YOUR CARES IN HOME SUPPORT SERVICES, LLC

Medford · Full-time

[Apply Now](#)

Like
 Comment
 Share

Write a comment...

Write a post...

Photo/Voice
 Tag Friends
 Check in
...

All Your Cares In Home Support Services, LLC

October 6 at 6:30 PM ·

Today we celebrate our client's doggie's birthday! Today Ace is 8!
Happy birthday spoiled Westie!

Ask All Your Cares In Home Support Services, LLC

"Is anyone available to chat?"

"Where are you located?"

"Can I book an appointment?"

Type a question... Send

Community [See All](#)

[Invite your friends to like this Page](#)

300 people like this

302 people follow this

About [See All](#)

843 E Main St Suite 204 (0.26 mi)
Medford, Oregon 97504
[Get Directions](#)
(541) 951-4302
 Typically replies within a day [Send Message](#)

Home Health Care Service
 Price Range \$
 Hours [Always Open](#)
 Suggest Edits

Page Transparency [See More](#)

Facebook is showing information to help you better understand the purpose of a Page. See actions taken by ** the people who manage and post content.

Page created - November 20, 2017

Team Members

[Amanda Kell-Scobie](#)

[All Your Cares In Home Supp...](#)

<https://www.facebook.com/allyourcaresihss/posts/410370049677119>

10/16/2019

Exhibit 3-1 (Plaintiff's Logo)



Exhibit 3-2 (Defendant's Logo)

